

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF NORTH CAROLINA  
WINSTON-SALEM DIVISION**

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Kevin Curry and Christine Curry, on behalf of	)	
themselves and others similarly situated,	)	
	)	
Plaintiff	)	Case No. 1:22-cv-00697
	)	
	)	
v.	)	
	)	
Novant Health, Inc.,	)	
	)	
Defendant	)	
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**TO BE CONSOLIDATED WITH:**

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David Novack, on behalf of himself and all	)	
others similarly situated,	)	
	)	
Plaintiff	)	Case No. 1:22-cv-00700
	)	
	)	
v.	)	
	)	
Novant Health, Inc.,	)	
	)	
	)	
Defendant	)	
<hr/>	)	

**TO BE CONSOLIDATED WITH:**

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Keith Van Allen, on behalf of himself and all	)	
others similarly situated,	)	Case No. 1:22-cv-00709
	)	
Plaintiff	)	
	)	
	)	
v.	)	
	)	

Novant Health, Inc.,	)
	)
Defendant	)
_____	)

**TO BE CONSOLIDATED WITH:**

Natalie Wells-Reyes, on behalf of herself and all)	
others similarly situated,	)
	)
Plaintiff,	)
	)
	)
v.	)
	)
Novant Health, Inc.,	)
	)
Defendant	)
_____	)

Case No. 1:22-cv-00799

**PLAINTIFFS’ JOINT MOTION TO CONSOLIDATE RELATED CASES**

Under Fed. R. Civ P. 42(a), Plaintiffs Kevin Curry, Christine Curry, David Novack, Keith Van Allen, and Natalie Wells-Reyes (collectively, “Plaintiffs”), on behalf of a putative class, move to consolidate for all purposes the above-captioned matter against Defendant Novant Health, Inc. (“Novant Health” or “Defendant”). Plaintiffs agree consolidation is appropriate because these cases concern very similar, if not the same, factual allegations. Plaintiffs request the Court consolidate all cases under the first-filed action, *Curry, et al., v. Novant Health, Inc.*, Case No. 1:22-cv-00697 and caption the consolidated action as *In re: Novant Health, Inc.*, Case No. 1:22-cv-00697.

Respectfully submitted,

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*Counsel for Plaintiffs and Putative Class*

**CERTIFICATE OF CONSULTATION**

I hereby certify pursuant to Local Rule 6.1 Plaintiffs' Counsel consulted with attorneys for Defendants, and counsel for Defendant Novant Health, Inc., does not oppose this request.

/s/ Scott C. Harris

Scott C. Harris

**CERTIFICATE OF SERVICE**

I hereby certify that on October 4, 2022, I caused the foregoing document to be electronically filed with the Clerk of Court using the CM/ECF system which will send notification of the filing to all parties of record.

/s/ Scott C. Harris  
Scott C. Harris